

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2011-304-C**

IN RE: Complaint and Petition for Relief	)	
of Bellsouth Telecommunications, LLC	)	
d/b/a AT&T Southeast d/b/a AT&T	)	<b>HALO WIRELESS, INC.'S FIRST</b>
South Carolina v. Halo Wireless, Inc.,	)	<b>REQUEST FOR PRODUCTION OF</b>
for Breach of the Parties'	)	<b>DOCUMENTS TO SOUTH CAROLINA</b>
Interconnection Agreement	)	<b>TELEPHONE COALITION</b>
	)	

TO: M. John Bowen, Jr., Esquire and Margaret M. Fox, Esquire, Attorneys for South Carolina Telephone Coalition

Halo Wireless, Inc. hereby requests South Carolina Telephone Coalition ("SCTC") as soon as possible, but no later than twenty (20) days after service hereof, to answer the First Request for Production of Documents in accordance with South Carolina Public Service Commission Rule 103-833. In this Request for Production, the term "party" is used to designate SCTC. This Request for Production shall be deemed to continue until the time of the hearing of the case.

**IT IS HEREIN REQUESTED:**

- A. That all information shall be provided to the undersigned in the format as requested.
- B. That all responses to the below Request for Production shall be labeled using the same numbers as used herein.
- C. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to this Request for Production in the appropriate sequence.
- D. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.

**HALO WIRELESS INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**  
**TO SOUTH CAROLINA TELEPHONE COALITION**

- E. That any exhibits be reduced to an 8 1/2" x 11" format.
- F. That, in addition to the signature and verification at the close of each response, the individual responsible for the information contained in each answer be also identified.
- G. That each Request for Production be reproduced at the beginning of the response thereto.
- H. That three (3) copies of the response to this Request for Production be provided to the undersigned as soon as possible.
- I. If the response to any Request for Production is that the information requested is not currently available, state when the information requested will become available.
- J. This Request for Production shall be deemed continuing so as to require you to supplement or amend your responses as any additional information becomes available up to and through the date of the hearing.
- K. If a privilege not to answer is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.
- L. If a refusal to answer a Request for Production is stated on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of man hours and costs required to conduct the search.
- M. Answer each Request for Production on the basis of your entire knowledge, including information in the possession of SCTC, its officers, directors, members, employees, consultants, representatives, attorneys, subsidiaries, and subcontractors.
- N. If any Request for Production cannot be answered in full, answer to the extent possible and specify reasons for inability to answer.

## **DEFINITIONS**

1. AS USED HEREIN, "AT&T" SHALL MEAN BELLSOUTH TELECOMMUNICATIONS, LLC D/B/A AT&T SOUTHEAST D/B/A AT&T SOUTH CAROLINA, WITH ITS EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF AT&T.
2. AS USED HEREIN, "ORS" SHALL MEAN SOUTH CAROLINA OFFICE OF REGULATORY STAFF, WITH ITS EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF ORS.
3. AS USED HEREIN, "SCTC" SHALL MEAN SOUTH CAROLINA TELEPHONE COALITION, WITH ITS MEMBER COMPANIES, EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF SCTC.
4. AS USED HEREIN, "HALO" SHALL MEAN HALO WIRELESS, INC., WITH ITS EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF HALO.
5. AS USED HEREIN, "TRANSCOM" SHALL MEAN TRANSCOM ENHANCED SERVICES, INC., WITH ITS EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF TRANSCOM.
6. PLEASE CONSTRUE "AND" AS WELL AS "OR" EITHER DISJUNCTIVELY OR CONJUNCTIVELY AS NECESSARY TO BRING WITHIN THE SCOPE OF THESE

REQUESTS FOR PRODUCTION ANY INFORMATION WHICH MIGHT OTHERWISE BE CONSTRUED OUTSIDE THEIR SCOPE.

7. "DOCUMENT" SHALL MEAN ANY WRITTEN, PRINTED, TYPED, RECORDED, PHOTOGRAPHIC OR OTHER GRAPHIC MATTER OF ANY KIND OR NATURE, AND ALL MECHANICAL AND ELECTRICAL SOUND RECORDINGS AND ANY TRANSCRIPTS THEREOF, AND COMPUTER DATA FILES IN YOUR POSSESSION, CUSTODY, AND/OR CONTROL, OR KNOWN BY YOU TO EXIST; IT SHALL ALSO MEAN ALL COPIES OF DOCUMENTS BY WHATEVER MEANS MADE.
8. "IDENTIFY" OR "IDENTITY" USED WITH REFERENCE TO AN INDIVIDUAL MEANS TO STATE HIS OR HER FULL NAME, PRESENT OR LAST KNOWN ADDRESS, PRESENT OR LAST KNOWN POSITION AND BUSINESS AFFILIATION, AND EMPLOYER, TITLE, AND POSITION AT THE TIME IN QUESTION. IF THE PERSON WAS AN OFFICER, DIRECTOR, TRUSTEE, COMMISSIONER, OR EMPLOYEE OF SCTC, ALSO STATE THE JOB TITLE AND AREAS OF RESPONSIBILITY.
9. "IDENTIFY" OR "IDENTITY" USED WITH REFERENCE TO A WRITING MEANS TO STATE THE DATE, AUTHOR, TYPE OF DOCUMENT (E.G. LETTER, MEMORANDUM, TELEGRAM, CHART, NOTE APPLICATION, ETC.) OR OTHER MEANS OF IDENTIFICATION, AND ITS PRESENT LOCATION OR CUSTODIAN. IF ANY SUCH DOCUMENT IS NO LONGER IN SCTC'S POSSESSION OR SUBJECT TO THEIR CONTROL, STATE WHAT DISPOSITION WAS MADE OF IT.
10. "YOU" AND "YOURS" INCLUDE SCTC AS DEFINED HEREIN, AND ANY OF ITS MEMBERS, INDIVIDUALLY, WHO HAVE KNOWLEDGE OR CONTROL OF INFORMATION REQUESTED IN THE REQUEST FOR PRODUCTION.

### **REQUESTS FOR PRODUCTION**

1. Produce all documents that evidence any communications between SCTC and AT&T, other than publically filed documents listed on the docket in this proceeding, and related to the facts and/or issues in this Docket.
2. Produce all emails between SCTC and AT&T that mention Halo or Transcom.
3. Produce all written communications between SCTC and AT&T that mention Halo or Transcom.
4. Produce all documents that evidence any communications between SCTC and ORS, other than publically filed documents listed on the docket in this proceeding, and related to the facts and/or issues in this Docket.
5. Produce all emails between SCTC and ORS that mention Halo or Transcom.
6. Produce all written communications between SCTC and ORS that mention Halo or Transcom.
7. Produce all documents or other information provided to any third party (non-SCTC) that relates to Halo or Transcom.
8. Produce all documents that evidence any breach of the interconnection agreement between AT&T and Halo.
9. Produce all documents, data, or analysis that any witness proffered by SCTC reviewed, referred to, or relied upon in testimony submitted in this proceeding.

[signature page to follow]

s /John J. Pringle, Jr.

**JOHN J. PRINGLE, JR.**  
South Carolina State Bar No. 11208  
**ELLIS, LAWHORNE & SIMS, P.A.**  
1501 Main Street, 5th Floor  
P.O. Box 2285  
Columbia, South Carolina 29202  
Telephone: 803.343.1270  
Fax: 803.799.8479  
[jpringle@ellislawhorne.com](mailto:jpringle@ellislawhorne.com)

**STEVEN H. THOMAS**  
Texas State Bar No. 19868890  
**TROY P. MAJOUÉ**  
Texas State Bar No. 24067738  
**JENNIFER M. LARSON**  
Texas State Bar No. 24071167  
**McGUIRE, CRADDOCK  
& STROTHER, P.C.**  
2501 N. Harwood, Suite 1800  
Dallas TX 75201  
Phone: 214.954.6800  
Fax: 214.954.6850

**W. SCOTT MCCOLLOUGH**  
Texas State Bar No. 13434100  
**McCOLLOUGH|HENRY PC**  
1250 S. Capital of Texas Hwy., Bldg. 2-235  
West Lake Hills, TX 78746  
Phone: 512.888.1112  
Fax: 512.692.2522

*Attorneys for Halo Wireless, Inc.*

March 22, 2012  
Columbia, South Carolina

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2011-304-C**

IN RE:

Complaint and Petition for Relief of           )  
BellSouth Telecommunications, LLC           )  
d/b/a AT&T southeast d/b/a AT&T           )  
South Carolina v. Halo Wireless,           )  
Incorporated for Breach of the Parties'       )  
Interconnection Agreement                    )

**CERTIFICATE OF SERVICE**

This is to certify that I have caused to be served this day, one (1) copy of **Halo Wireless, Inc.'s First Request for Production of Documents to the South Carolina Telephone Coalition** as follows:

**VIA ELECTRONIC AND 1<sup>ST</sup> CLASS MAIL SERVICE**

Nanette S. Edwards, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Legal Department  
Columbia SC 29201

**VIA ELECTRONIC AND 1<sup>ST</sup> CLASS MAIL SERVICE**

Patrick W. Turner, Esquire  
AT&T South Carolina  
1600 Williams Street  
Suite 5200  
Columbia SC 29201

**VIA ELECTRONIC AND 1<sup>ST</sup> CLASS MAIL SERVICE**

M. John Bowen, Jr. Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, PA  
PO Box 11390  
Columbia SC 29211

s/ Carol Roof  
Carol Roof

March 22, 2012  
Columbia, South Carolina